Case 19-17072-amc Doc 103 Filed 01/10/22 Entered 01/10/22 11:37:36 Desc Main Document Page 1 of 2

## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF PENNSYLVANIA

In re:

:

SHEILA R. LEE : Chapter 13

:

Debtor : No. 19-17072-AMC

## OBJECTION OF THE CHAPTER 13 TRUSTEE TO DEBTOR'S COUNSEL'S FEE APPLICATION

Scott F. Waterman, Esq., Standing Chapter 13 Trustee, by and through his attorney, files this Objection to Debtor's counsel's ("Applicant's") Fee Application and represents as follows:

- 1. The within case was commenced by the filing of a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on November 9, 2019.
- 2. Debtor reported that her income was below median. <u>See</u> Chapter 13 Statement of Current Monthly Income, Form 122C-1 [Docket No. 11].
- Applicant's Disclosure of Compensation indicated that she agreed to accept
  \$6,000 for legal fees.
- 4. The case is not a complicated one, did not present any novel legal issues and debtor's counsel did not file any motions, nor did she have to reply to any motions for relief.
- 5. Applicant has failed to comply with Local Bankruptcy Rule 2016-3(a)(2) and L.B.F. 2016-3B by failing to attach her time records setting forth the dates and amount of time expended for the services performed.
  - 6. Upon information and belief the legal fees sought by Applicant are unreasonable.
- 7. The Application should be denied in part and the allowed fees, should be reduced to \$4,000.00, (the amount which was the "no look" fee in 2019).

Case 19-17072-amc Doc 103 Filed 01/10/22 Entered 01/10/22 11:37:36 Desc Main Document Page 2 of 2

8. Alternatively, the Application should be denied as the Applicant has failed to comply with Local Bankruptcy Rule 2016-3(a).

**WHEREFORE**, Scott F. Waterman, Esq., Chapter 13 Trustee, by and through counsel respectfully requests that this Court deny Debtor's Counsel's Application for Counsel Fees.

Respectfully submitted,

Date: January 10, 2022 /s/Ann E. Swartz

Ann E. Swartz, Esq.

Counsel for

Standing Chapter 13 Trustee

2901 St. Lawrence Avenue, Suite 100

Reading, PA 19606

Telephone: (610) 779-1313